

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: SALVATORE PAUL BURCHERI : CHAPTER 13  
Debtor :  
 :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE :  
Movant :  
 :  
vs. :  
 :  
SALVATORE PAUL BURCHERI :  
Respondent : CASE NO. 5-22-bk-00440

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 11th day of April, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. The Trustee avers that debtor's plan is not feasible based upon the following:
  - a. Secured claims not in plan – PA Department of Revenue.
2. Trustee avers that debtor's plan cannot be administered due to the lack of the following:
  - a. The debtor has not provided to the Trustee copies of 2021 Federal Income Tax returns as required by § 521(e)(2)(A).
  - b. Current Profit and Loss Statement for six (6) months – September, 2021 through February, 2022.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 19th day of April, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Vincent Rubino, Esquire  
712 Monroe Street  
P.O. Box 511  
Stroudsburg, PA 18360

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee